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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – OAKLAND DIVISION

In re NVIDIA CORPORATION
SECURITIES LITIGATION

Case No. 4:18-cv-07669-HSG

CLASS ACTION

**STIPULATION AND ORDER TO
EXTEND TIME TO REACH
AGREEMENT ON SCHEDULE FOR
FILING OF THE CONSOLIDATED
AMENDED COMPLAINT AND
ANSWER OR OTHER RESPONSE TO
THE CONSOLIDATED AMENDED
COMPLAINT**

JUDGE: HON. HAYWOOD S. GILLIAM, JR.
COURTROOM: 2

1 This Stipulation is entered into by and between Lead Plaintiffs E. Öhman J:Or Fonder AB
2 ("Öhman Fonder") ("Öhman Fonder") and Stichting Pensionenfonds PGB ("PGB," and with Öhman
3 Fonder, "Lead Plaintiffs") and Defendants NVIDIA Corporation ("NVIDIA"), NVIDIA's President
4 and Chief Executive Officer, Jensen Huang, and NVIDIA's Executive Vice President and Chief
5 Financial Officer, Collette Kress (collectively, "Defendants") (together with Lead Plaintiffs, the
6 "Parties").

7 **WHEREAS**, on May 2, 2019, the Court appointed Öhman Fonder and PGB as Lead Plaintiffs
8 and their undersigned counsel as Lead Counsel for the putative class, and ordered that "within ten days
9 of this order the parties shall meet and confer and submit a proposed schedule for the filing of a
10 consolidated or amended complaint and the filing of Defendants' response thereto" (ECF No. 89);

11 **WHEREAS**, on May 3, 2019, May 7, 2019, May 8, 2019, May 9, 2019, May 10, 2019, May
12 12, 2019, and May 13, 2019, the Parties met and conferred regarding a schedule for Lead Plaintiffs'
13 filing of a consolidated amended complaint and any corresponding answer or responsive motion
14 thereto;

15 **WHEREAS**, the Defendants require additional time to obtain client approval with respect to
16 a mutually agreeable schedule; and

17 **WHEREAS**, the Parties anticipate reaching an agreement on a schedule within the week.

18 **THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and between the
19 Parties, through their undersigned counsel, as follows:

20 1. The Parties will submit a stipulation and proposed order on a schedule for the filing of
21 the consolidated amended complaint and any corresponding answer or responsive motion thereto by
22 May 17, 2019.

23 Dated: May 13, 2019

COOLEY LLP

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/s/ John C. Dwyer
John C. Dwyer (136533)

26 Attorneys for Defendants
27 NVIDIA CORPORATION, JENSEN
28 HUANG, and COLETTE KRESS

1 Dated: May 13, 2019

Respectfully submitted,

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**KESSLER TOPAZ
MELTZER & CHECK, LLP**

4 /s/ Jennifer Joost
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6
7 -and-

8
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14 *Counsel for Lead Plaintiff E. Öhman J:or Fonder AB*
15 *and Lead Counsel for the Class*

16
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27 *Counsel for Lead Plaintiff Stichting Pensioenfonds PGB*
28 *and Lead Counsel for the Class*

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Liaison Counsel for Lead Plaintiffs and for the Class

ATTESTATION OF CONCURRENCE IN FILING

Pursuant to the United States District Court for the Northern District of California, Civil L.R.
5-1(i)(3), I hereby attest that the concurrence to the filing of the foregoing document has been obtained
from each of the other signatories.

11 | Dated: May 13, 2019

/s/ John C. Dwyer

JOHN C. DWYER (136533)

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that:

16 1. The Parties will submit a stipulation and proposed order on a schedule for the filing of
17 the consolidated amended complaint and any corresponding answer or responsive motion thereto by
18 May 17, 2019.

19 || SO ORDERED.

Dated: 5/15/2019

Hon. Haywood S. Gilliam, Jr.
United States District Court Judge